

**The following is an e-mail the CEC received from:
Robert Stannard, VP of Technology
Gardner Industries
10/30/03 @ 10:30 AM**

Virginia Lew (all),

First let me thank you for taking my comments and concerns seriously. It shows that this committee has a deep desire to do what is right, and not just what is easy. Thanks to all involved!

The Exemption 1 to section 118 (i): "Aluminum-pigmented asphalt roof coatings shall meet the requirements of ASTM D2824 and be installed as specified by ASTM D-3805." definitely addressed the issues that I had in regards to the minimum performance requirements for liquid applied roof materials. I would like to make one final request. I would like to change the Exemption to read: Exemption 1 to section 118 (i): "Aluminum-pigmented asphalt roof coatings shall meet the requirements of ASTM D2824 or ASTM D-6848 and be installed as specified by ASTM D-3805."

My reason for this request is to make sure that we are not placing the aluminum pigmented asphalt roof coatings user into a position that will force them to use an unnecessarily high VOC coating. I know that this continues to be a hot topic in California, and for that matter the entire country. ASTM D 2824 -02 "Standard Specification for Aluminum-Pigmented Asphalt Roof Coatings, Nonfibered, Asbestos Fibered, and Fibered without Asbestos" limits the composition of the coating to no more than 3% water. ASTM D 6848-02 Standard Specification for Aluminum-Pigmented Emulsified Asphalt Used as a Protective Coating for Roofing." allows for lower VOC formulations. If anything ASTM D 6848-02 has more stringent requirements than does ASTM D 2824.

In addition to the standard requirements for uniformity and consistency, ASTM D 6848-02 Standard Specification for Aluminum-Pigmented Emulsified Asphalt Used as a Protective Coating for Roofing." requires that the product be tested for:

Reflectance:	ASTM D-2824
Drying time:	ASTM D 2939
Resistance to Water:	ASTM D 2939 (modified)
Weight Per Gallon:	ASTM D 2939
Consistency:	ASTM D 562
Residue By Evaporation:	ASTM D 2939
Water Content:	ASTM D 2939
Hydrogen Gas Generation:	ASTM D 6356
Accelerated Weathering:	Practice G 154

As you can see, the addition of this specification will in no way eliminate or minimize the performance requirements for Asphalt based aluminum coatings. Its addition

will open the door for lower VOC formulations. Thank you for your assistance in this matter.

I am available to discuss this issue if you have any questions, or need more information.

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